

EXHIBIT 12

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT
OF PENNSYLVANIA

* * * * *

BENEZET CONSULTING, LLC	*	
and TRENTON POOL,	*	Case No.
Plaintiffs	*	1:16-CV-0074
vs.	*	
PEDRO A. CORTES and	*	
JONATHAN MARKS,	*	
Defendants	*	

* * * * *

DEPOSITION OF
CAROL LOVE
September 29, 2016

COPY

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DEPOSITION
OF

CAROL LOVE, taken on behalf of the Defendants herein, pursuant to the Rules of Civil Procedure, taken before me, the undersigned, Bernadette M. Black, a Court Reporter and Notary Public in and for the Commonwealth of Pennsylvania, at the Office of Attorney General, Litigation Section, 15th Floor, Strawberry Square, Harrisburg, Pennsylvania, on Thursday, September 29, 2016 beginning at 9:10 a.m.

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I N D E X

WITNESS: CAROL LOVE

EXAMINATION

By Attorney Joel

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EXAMINATION

By Attorney Rossi

22 - 25

RE-EXAMINATION

By Attorney Joel

25 - 29

CERTIFICATE

30

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A P P E A R A N C E S

PAUL ANTHONY ROSSI, ESQUIRE

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CO-COUNSEL FOR DEFENDANTS

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EXHIBIT PAGE

PAGE
IDENTIFIED

NUMBER DESCRIPTION

DEFENDANT'S EXHIBITS:

20 Ms. Love's Answers to
Interrogatories

20

2 (Pages 2 to 5)

Sargent's Court Reporting Services, Inc.
(814)-536-8909

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OBJECTION PAGE

ATTORNEY

PAGE

Joel

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Q. All right. Please, if you could, wait for me to finish my question. I will try very hard to wait for you to finish your answer, because it makes it easier. The court reporter, it's easier for her if we're not talking over each other; okay?

A. Okay.

Q. If at any point you don't hear me, ask me to repeat the question, I will do so; okay?

A. Okay.

Q. If at any point you don't understand, ask me to rephrase it. Tell me what's confusing. I want to make a question that you understand so we're on the same page; okay?

A. Okay.

Q. Any reason, medically or otherwise, that you can't hear me or understand me today?

A. No.

Q. So, can we agree that if you answered, you've answered, you've not only heard me, but you've understood me and you've answered to the best of your ability and truthfully?

A. Yes.

Q. If at any point you'd like to take a break, I don't think we're going to be here this long, but all I ask is, answer the question that's on the table and

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PROCEEDINGS

CAROL LOVE, HAVING FIRST BEEN DULY SWORN, TESTIFIED AS FOLLOWS:

EXAMINATION

BY ATTORNEY JOEL:

Q. Good morning, Ms. Love. How are you?

A. Good.

Q. Good. My name is Kenneth Joel. I'm here with my colleague, Nicole Radziewicz. We represent the Defendants in this case. Have you ever been deposed before?

A. Have not.

Q. Let me tell you a few ground rules and it will make this go a lot faster. First of all, if you could, answer all my questions verbally, yes, no, whatever explanation you want to give is fine. Just stay away from non-verbal communication, shrugs, uh-huhs, uh-uhs, because it's hard for the court reporter to take it down and it will be harder still for us to figure out what you meant; okay.

A. Uh-huh (yes).

Q. Yes?

A. Yes.

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then take whatever break you want; all right?

A. Okay.

Q. All right. What do you do for a living?

A. I am a paralegal for the High Company.

Q. What company?

A. High Company, H-I-G-H Company.

Q. And where are they located?

A. Lancaster, Pennsylvania.

Q. How long have you done that?

A. Ten years.

Q. Did you go to school for paralegal studies or anything?

A. I did.

Q. Where?

A. I have a Bachelor's degree from Millersville. And then, I went to the Philadelphia Institute of Paralegal Training in Philadelphia.

Q. When did you get your B.A. from Millersville?

A. '90, 1990.

Q. And when did you complete your studies at the school in Philadelphia?

A. It was a four-month program that you had to have a B.A. to go into. And I finished that in '90 or '91, if I remember.

Q. Okay.

3 (Pages 6 to 9)

Page 10

1 A. I went right after college.
 2 **Q. How long have you worked at the High Company?**
 3 A. Ten years.
 4 **Q. Oh, I'm sorry. I already asked you that. I**
 5 **apologize. So, from 2006 to the present?**
 6 A. Correct.
 7 **Q. All right. Where did you work before that?**
 8 A. I worked for Pyfer and Reese, for one month.
 9 **Q. Is that a law firm?**
 10 A. It is.
 11 **Q. Are they in Lancaster?**
 12 A. They are.
 13 **Q. Where did you work before that?**
 14 A. Latsha, Davis.
 15 **Q. Where are they located?**
 16 A. Mechanicsburg.
 17 **Q. How long did you work there?**
 18 A. Probably, about, a year and a half.
 19 **Q. At the Pyfer firm, I'm assuming you were a**
 20 **paralegal there?**
 21 A. I was.
 22 **Q. And at the Latsha firm, were you also a paralegal?**
 23 A. I was.
 24 **Q. Before Latsha, Davis, where did you work?**
 25 A. I worked for Jacques Geisenberger. I don't

Page 11

1 remember what its --- I think it was Geisenberger and
 2 Cooper.
 3 **Q. Is that another law firm?**
 4 A. It is.
 5 **Q. Where are they located?**
 6 A. Lancaster.
 7 **Q. Were you a paralegal for them as well?**
 8 A. I was.
 9 **Q. And for how long did you work there?**
 10 A. About a year.
 11 **Q. How about before that?**
 12 A. Goldberg, Katzman.
 13 **Q. Where are they located?**
 14 A. This building, Harrisburg.
 15 **Q. Goldberg, Katzman?**
 16 A. Yes.
 17 **Q. And how long did you work there?**
 18 A. About a year and a half.
 19 **Q. And did you work there as a paralegal also?**
 20 A. I did.
 21 **Q. How about before Goldberg, Katzman?**
 22 A. You're testing my memory here. Before that, I
 23 believe I was at Armstrong World Industries, in
 24 Lancaster.
 25 **Q. How long were you there for?**

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1 A. About a year.
 2 **Q. And were you a paralegal there as well?**
 3 A. I was.
 4 **Q. Do you remember before that?**
 5 A. Barley Snyder, Lancaster; paralegal.
 6 **Q. And how long were you there?**
 7 A. Five years.
 8 **Q. Before then, are we getting --- or are we getting**
 9 **pretty close to when you got out of school?**
 10 A. Two more jobs.
 11 **Q. So what before Barley Snyder.**
 12 A. Morgan, Hallgren, Crosswell and Kane, Lancaster;
 13 paralegal, two or three years. I don't --- I don't
 14 remember exactly.
 15 **Q. And how about before there?**
 16 A. Jack Eisenberger, paralegal, Lancaster.
 17 **Q. And for how long?**
 18 A. From 1991, at three or four years. I don't --- I
 19 don't know the math there.
 20 **Q. Okay.**
 21 A. That was my first job.
 22 **Q. All right.**
 23 A. As paralegal.
 24 **Q. Where do you live?**
 25 A. Mountville, Pennsylvania.

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1 **Q. And where is that?**
 2 A. Lancaster County.
 3 **Q. And what's your address there?**
 4 A. Four Pennridge Avenue.
 5 **Q. And the ZIP Code?**
 6 A. 17554.
 7 **Q. How long have you lived there?**
 8 A. About 13 years.
 9 **Q. Have you --- well, strike that.**
 10 **I probably know the answer to this, but I'll ask**
 11 **it anyway. Are you a professional signature collector**
 12 **for campaigns and political parties and such?**
 13 A. No.
 14 **Q. Have you had any discussions --- or, do you know**
 15 **who Trenton Pool is?**
 16 A. Other than he's named in this lawsuit, no.
 17 **Q. Have you ever had any discussions with Trenton**
 18 **Pool at all?**
 19 A. Never.
 20 **Q. Have you ever had any discussions with anybody who**
 21 **is engaged by Mr. Pool to collect signatures?**
 22 A. No.
 23 **Q. How did you learn about this lawsuit?**
 24 A. Mr. Rossi.
 25 **Q. When did you first learn about it?**

4 (Pages 10 to 13)

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1 A. It would be about --- this summer, past summer.
 2 **Q. So the summer of 2016?**
 3 A. Or the year before. It was summertime. I don't
 4 know.
 5 ATTORNEY ROSSI:
 6 It was --- can we go off the record?
 7 ATTORNEY JOEL:
 8 Uh-huh (yes).
 9 OFF RECORD DISCUSSION
 10 ATTORNEY ROSSI:
 11 Okay. Back on. Just read it in.
 12 BY ATTORNEY JOEL:
 13 **Q. So, just so that's clear, you learned about this**
 14 **lawsuit from Mr. Rossi, and the first time you learned**
 15 **about this lawsuit was in the spring of 2016?**
 16 A. Correct.
 17 **Q. Did you know Mr. Rossi before he contacted you**
 18 **about this lawsuit?**
 19 A. I did.
 20 **Q. How long have you known him for?**
 21 A. Probably, about, 10 years, 12 years.
 22 **Q. How did you first come to know him?**
 23 A. Our dogs in the neighborhood.
 24 **Q. Is that in Mountville?**
 25 A. It is.

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1 **Q. How frequently, over the ten years, have you seen**
 2 **Mr. Rossi?**
 3 A. It depends, sometimes, two or three times a week.
 4 Sometimes, once a month.
 5 **Q. Do you live in the same neighborhood as Mr. Rossi?**
 6 A. The same vicinity. He doesn't live in my
 7 development.
 8 **Q. Are you friends with Mr. Rossi?**
 9 A. Yes.
 10 **Q. You married?**
 11 A. I am not.
 12 **Q. You have any other sort of relationship with Mr.**
 13 **Rossi?**
 14 A. No.
 15 **Q. Have you ever had any sort of intimate**
 16 **relationship with Mr. Rossi?**
 17 A. No.
 18 **Q. How was it that Mr. Rossi contacted you about this**
 19 **lawsuit?**
 20 A. He told me about the general idea of what the
 21 lawsuit was going to be and asked me if I would be a
 22 Plaintiff in the case.
 23 **Q. And that was sometime in the spring of 2016?**
 24 A. Correct.
 25 **Q. And, obviously, because you're sitting here, you**

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1 **agreed to do so?**
 2 A. Correct.
 3 **Q. Did you vote in this year's primary?**
 4 A. No.
 5 **Q. And are you registered?**
 6 A. Oh, wait a minute. Yes, I did.
 7 **Q. Okay.**
 8 A. Yes, I did.
 9 **Q. Are you registered as a Democrat or a Republican?**
 10 A. Republican.
 11 **Q. So, just to make sure it's clear; you voted in the**
 12 **Republican 2016 primary?**
 13 A. Correct.
 14 **Q. Did you vote in the general election in 2012?**
 15 A. Yes.
 16 **Q. Did you vote in the Republican primary? Well, let**
 17 **me ask this; how long have you been a registered**
 18 **Republican?**
 19 A. Since I've been a registered voter.
 20 **Q. And when was that? When did you first become**
 21 **registered?**
 22 A. I don't know. Sorry.
 23 **Q. Did you vote in the 2012 Republican primary?**
 24 A. I don't remember.
 25 **Q. Did you vote in the 2008 general election?**

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1 A. I believe so.
 2 **Q. Did you vote in the 2008 Republican primary?**
 3 A. I don't remember.
 4 **Q. Did you vote in the 2004 general election?**
 5 A. I don't remember.
 6 **Q. Did you vote in the 2004 Republican primary?**
 7 A. I don't remember.
 8 **Q. Did you vote in the 2000 general election?**
 9 A. I don't remember.
 10 **Q. Did you vote in the 2000 Republican primary?**
 11 A. I don't remember.
 12 **Q. Did you vote in the 1996 general election?**
 13 A. I don't remember.
 14 **Q. Did you vote in the 1996 Republican primary?**
 15 A. I don't remember.
 16 **Q. Did you vote in the 1992 general election?**
 17 A. I don't remember.
 18 **Q. Did you vote in the 1992 Republican primary?**
 19 A. I don't remember.
 20 **Q. When you graduated from Millersville, in 1990,**
 21 **were you about 22 years old?**
 22 A. Yes.
 23 **Q. I'm just trying to figure out how far back I have**
 24 **to go with the elections until you weren't eligible to**
 25 **vote. So, 1992, did you vote in the general election?**

5 (Pages 14 to 17)

Page 18

1 A. I still don't remember.
 2 **Q. How about the 1992 Republican primary; did you**
 3 **vote?**
 4 A. I don't remember.
 5 **Q. The 1998 general election. Did you vote?**
 6 A. I don't remember.
 7 **Q. The 1998 Republican primary. Did you vote?**
 8 A. I don't remember.
 9 **Q. If my math is correct, you probably turned 18 in**
 10 **1986; does that sound right?**
 11 A. Yeah. About there.
 12 **Q. So, you were born in 1968?**
 13 A. No. I was born in 1966.
 14 **Q. So, let's go back one more election, just to cover**
 15 **it. Did you vote in the 1984 general election?**
 16 A. I don't remember.
 17 **Q. Did you vote in the 1984 Republican primary?**
 18 A. I don't remember.
 19 ATTORNEY RADZIEWICZ:
 20 1988.
 21 ATTORNEY JOEL:
 22 Did I?
 23 ATTORNEY RADZIEWICZ:
 24 Yeah. 1998 twice.
 25 ATTORNEY JOEL:

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1 Oh, okay.
 2 ATTORNEY RADZIEWICZ:
 3 Uh-huh (yes).
 4 BY ATTORNEY JOEL:
 5 **Q. Did you vote in the 1988 general election?**
 6 A. I don't remember.
 7 **Q. Did you vote in the 1988 Republican primary?**
 8 A. I don't remember.
 9 **Q. When you voted in the 2016 Republican primary, am**
 10 **I correct that you only got to cast your vote for one**
 11 **of the Republicans listed?**
 12 A. Correct.
 13 **Q. And recognizing that you don't remember if you**
 14 **voted any of the other times, am I correct that ---**
 15 **whether it was the general election or the primary**
 16 **election for the Republican party, you would have cast**
 17 **one vote?**
 18 A. Correct.
 19 **Q. Have you ever been approached to sign a petition**
 20 **to get a Republican or Democratic candidate on the**
 21 **primary ballot for president?**
 22 A. No. Not that I remember.
 23 **Q. So, I take it, you have never signed a Republican**
 24 **or Democratic petition to get somebody on the primary**
 25 **ballot for President of the United States?**

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1 A. Not that I remember.
 2 **Q. In the 2016 primary, who did you vote for?**
 3 A. I, honestly, don't remember.
 4 **Q. Fair enough. But it's safe to say you went in and**
 5 **actually voted for somebody for President?**
 6 A. Correct.
 7 **Q. You just don't know who?**
 8 A. Correct.
 9 ATTORNEY JOEL:
 10 We've got that one. Next, please. I'm
 11 not sure what number we're up to.
 12 ATTORNEY RADZIEWICZ:
 13 Up to 20.
 14 ATTORNEY JOEL:
 15 Thanks.
 16 (Defendant's Exhibit 20 marked for
 17 identification.)
 18 BY ATTORNEY JOEL:
 19 **Q. Ms. Love, I'm showing you what's been marked as**
 20 **Defendant's 20. Take a look at it. My first**
 21 **question's going to be in relation to the last page; is**
 22 **that your signature?**
 23 A. Yes.
 24 **Q. I had a question about a couple of the answers in**
 25 **here. If you look at number 12, go ahead and read it,**

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1 **and when you're done, let me know.**
 2 **WITNESS COMPLIES**
 3 A. Okay.
 4 BY ATTORNEY JOEL:
 5 **Q. Who made you aware that a circulator intended to**
 6 **seek your signature for one of the candidates for**
 7 **President during February 2016?**
 8 A. Mr. Rossi.
 9 **Q. And when did he make you aware of that?**
 10 A. The time he asked me about being a Plaintiff in
 11 the lawsuit.
 12 **Q. It also says that you learned after the fact, that**
 13 **the circulator who intended to travel to Lancaster**
 14 **County to circulate nomination petitions in Mountville,**
 15 **did not seek your signature for the sole reason he was**
 16 **not able to secure an in-state witness in Lancaster**
 17 **County to witness and execute the nomination petition**
 18 **for Senator Cruz, in Lancaster County; who told you**
 19 **that?**
 20 A. Mr. Rossi.
 21 **Q. When did he tell you that?**
 22 A. At the same time he asked me to be a Plaintiff.
 23 ATTORNEY JOEL:
 24 Take a couple minutes. I think I'm just
 25 about done.

6 (Pages 18 to 21)

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1 SHORT BREAK TAKEN
 2 OFF RECORD DISCUSSION
 3 BY ATTORNEY JOEL:
 4 **Q. Ms. Love, in --- in any of the presidential**
 5 **election years that you've been of-age to vote and**
 6 **registered to vote, have you ever seen when you've been**
 7 **out shopping or walking or doing anything else, folks**
 8 **walking around trying to collect signatures for**
 9 **presidential candidates?**
 10 A. Not that I remember.
 11 ATTORNEY JOEL:
 12 I got nothing else, at this point. Thank
 13 you. Your attorney may have some questions and I may
 14 have some follow-up, but I've got nothing more right
 15 now.
 16 ATTORNEY ROSSI:
 17 Just a few.
 18 EXAMINATION
 19 BY ATTORNEY ROSSI:
 20 **Q. Mr. Joel established the record for your --- your**
 21 **voting history and what --- in what specific years you**
 22 **remember. Now, you testified that you voted in the**
 23 **2016 presidential election, the vice president. Oh,**
 24 **strike that. It's a great way to start the morning.**
 25 **You testified that you voted in the 2016**

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1 **Republican primary election?**
 2 A. Correct.
 3 **Q. Right. And that, to the best of your**
 4 **recollection, you voted in the 2012 general election?**
 5 A. Correct.
 6 **Q. But then, thereafter, you can't remember specific**
 7 **elections in which you voted?**
 8 A. Correct.
 9 **Q. To the best of your knowledge, was the 2012**
 10 **general election the first time that you cast a ballot**
 11 **in an election?**
 12 A. No.
 13 **Q. So you have voted in prior elections, other than**
 14 **---?**
 15 A. Right.
 16 **Q. Okay. Other than 2012 and 2016?**
 17 A. Correct.
 18 ATTORNEY JOEL:
 19 Just object to the form.
 20 ATTORNEY ROSSI:
 21 Okay.
 22 BY ATTORNEY ROSSI:
 23 **Q. Have you voted in elections, other than the**
 24 **elections that you can remember that you voted in**
 25 **today?**

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1 A. Yes.
 2 **Q. Now, back in spring of this year, there were**
 3 **multiple conversations with respect to you. There was**
 4 **multiple --- there was conversations. Strike that.**
 5 **In the spring of this year, you had indicated a**
 6 **willingness to sign nominating petitions for multiple**
 7 **presidential candidates?**
 8 A. Correct.
 9 **Q. And when that didn't --- and then --- and you**
 10 **were, however, not afforded an opportunity to sign**
 11 **those petitions; correct?**
 12 A. Correct.
 13 **Q. And then, thereafter, you were advised of an**
 14 **ability to become a Plaintiff in this action?**
 15 A. Correct.
 16 **Q. You don't --- do you know the specific dates of**
 17 **any of that, any of those conversations occurred?**
 18 A. No, I do not.
 19 **Q. You have --- have you ever signed a republican ---**
 20 **have you ever signed a nominating petition for any**
 21 **other candidate?**
 22 A. Presidential?
 23 **Q. No. Any candidate.**
 24 A. Any candidate? I know I remember one.
 25 **Q. And would that --- was that a local or a state**

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1 **candidate?**
 2 A. Local.
 3 **Q. So, a local candidate. And how did that occur?**
 4 A. Came --- came to my door, told me he was running
 5 for Magisterial District Judge and would I sign his
 6 petition.
 7 **Q. And did you sign his petition?**
 8 A. I did.
 9 **Q. Is that the only occasion that you have been**
 10 **afforded the opportunity to sign a petition?**
 11 A. That I remember.
 12 ATTORNEY ROSSI:
 13 That's all I have.
 14 ATTORNEY JOEL:
 15 A few follow-ups.
 16 RE-EXAMINATION
 17 BY ATTORNEY JOEL:
 18 **Q. Just so that it's clear; you definitely remember**
 19 **voting in the 2016 Republican primary; correct?**
 20 A. Correct.
 21 **Q. And you voted for only one candidate on that**
 22 **ballot, I'm assuming; correct?**
 23 A. Correct.
 24 **Q. And I'm just not sure what you said. Do you**
 25 **actually remember voting in the 2012 general election?**

7 (Pages 22 to 25)

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1 A. 2012 was the last --- second time Obama; right?
 2 **Q. Yes.**
 3 A. I'm pretty sure I voted. I'm not 100 percent sure
 4 I voted.
 5 **Q. Okay.**
 6 A. I know I voted. I do remember that I voted the
 7 first time he ran. You can change that part of the
 8 answer.
 9 **Q. Okay.**
 10 A. I do remember that I did not vote for him when he
 11 first ran.
 12 **Q. So, you remember voting in the 2008 general**
 13 **election?**
 14 A. Yes.
 15 **Q. And the other elections we talked about, you have**
 16 **no memory of whether you voted in either the general or**
 17 **the primary?**
 18 A. I do not, specifically, remember. I do know I had
 19 voted in presidential elections before. I do not
 20 remember which one, specifically.
 21 **Q. Do you have a recollection of ever voting in a**
 22 **Republican primary for President before, other than**
 23 **this year?**
 24 A. I don't have a specific recollection. No.
 25 **Q. But, in any event, had you voted in a Republican**

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1 **primary, am I correct that you would have voted for**
 2 **only one candidate?**
 3 A. Yes.
 4 **Q. Now, you said you signed a petition for a**
 5 **Magisterial District Justice. Was that actually the**
 6 **candidate himself who came to your door?**
 7 A. Yes.
 8 **Q. So the candidate came to your door, asked you to**
 9 **sign his petition, and you did?**
 10 A. Correct.
 11 **Q. Defendant's 20, which is your Answer to**
 12 **Interrogatories, did you review them before you signed**
 13 **and verified them?**
 14 A. Yes.
 15 **Q. So, am I correct that, as per your verification,**
 16 **they are true to the best of your knowledge,**
 17 **information, and belief?**
 18 A. Yes.
 19 **Q. In the Republican primary that just happened --- I**
 20 **want to make sure that this is clear to me, because**
 21 **it's now unclear. Let's start at it this way; you**
 22 **learned about this lawsuit in the spring of 2016?**
 23 A. Correct.
 24 **Q. And that was through discussions with Mr. Rossi?**
 25 A. Correct.

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1 **Q. No other information you had, other than what was**
 2 **provided to you by Mr. Rossi?**
 3 A. Correct.
 4 **Q. You haven't talked to anybody else about this**
 5 **lawsuit, except Mr. Rossi?**
 6 A. Correct.
 7 **Q. At any point in time, either before you joined or**
 8 **to-date?**
 9 A. Correct.
 10 **Q. And you say spring; can we narrow that down any**
 11 **more? Was it March, was it April, recognizing that, I**
 12 **believe, the amended complaint looks like it might have**
 13 **been filed in February of 2016?**
 14 A. I don't, specifically, remember.
 15 **Q. That's fine.**
 16 ATTORNEY JOEL:
 17 I think, that's it. Thanks.
 18 ATTORNEY ROSSI:
 19 That's it.
 20 ATTORNEY JOEL:
 21 Would you like to read and sign this?
 22 ATTORNEY ROSSI:
 23 Yes.
 24 A. Sure.
 25 ATTORNEY JOEL:

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1 Okay.
 2 ATTORNEY ROSSI:
 3 Yeah. All right.
 4 ATTORNEY JOEL:
 5 Okay. Fair enough. Thanks for your
 6 time. Safe travels back to Lancaster.
 7 * * * * *
 8 DEPOSITION CONCLUDED AT 9:43 A.M.
 9 * * * * *

8 (Pages 26 to 29)

1 COMMONWEALTH OF PENNSYLVANIA)
2 COUNTY OF BEDFORD)
3 CERTIFICATE

4 I, Bernadette M. Black, a Notary Public in
5 and for the Commonwealth of Pennsylvania, do hereby
6 certify:

7 That the foregoing proceedings, deposition of
8 Carol Love was reported by me on 9/29/16 and that I,
9 Bernadette M. Black, read this transcript, and that I
10 attest that this transcript is a true and accurate
11 record of the proceeding.

12 That the witness was first duly sworn to
13 testify to the truth, the whole truth, and nothing but
14 the truth and that the foregoing deposition was taken
15 at the time and place stated herein.

16 I further certify that I am not a relative,
17 employee or attorney of any of the parties, nor a
18 relative or employee of counsel, and that I am in no
19 way interested directly or indirectly in this action.

20 *Bernadette M. Black*



21
22 Bernadette M. Black,
23 Court Reporter
24
25

A	7:7 14:5,7	best 8:20	close 12:9	28:3,6,9
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October 18, 2016

Ms. Carol Love
c/o Paul Rosi, Esquire
316 Hill Street
Mountville, PA 17554

Dear Mr. Love:

Enclosed you will find a copy of your deposition that was held on 9/29/2016 in the Benezet Consulting, LLC, et al. v. Pedro A. Cortes, et al. case.

Also enclosed you will find a correction page to review with the transcript. While reading the deposition, you may note any corrections you wish to make. All corrections must be noted on the correction page. Please do not write on the transcript itself.

After you have completed reading and making your corrections, if any, take the correction page to a Notary Public and sign it in the Notary's presence.

Please return this transcript along with the signed and notarized correction page to our Johnstown office within 30 days of the date of this letter.

Upon receipt of your correction page, it will be mailed to Kenneth Joel, Esquire. A copy will be sent to Paul A. Rossi, Esquire.

Thank you for your attention in this matter. If you have any questions, feel free to contact our office.

Sincerely,

John Sargent JK
Sargent's Court Reporting Service, Inc.

No. 121868
Enclosures

cc: Kenneth Joel, Esquire
Paul A. Rossi, Esquire

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